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ABSTRACT

The purposes of educational paperwork, the reasons it may be excessive, and suggestions for mitigating excessive paperwork are presented in this document. According to the author, educational paperwork has four purposes: as a substitute for onsite inspection, as a "pseudo-contract" to encourage compliance, as a due process and participation mechanism, and as a consciousness-raising device. Educational paperwork may be burdensome or excessive, he says, when, like much regulatory paperwork, it imposes standardization on highly varied problems, when demands for accountability are extended to inappropriate situations, or when documentation is used to attempt to forestall deception. Six paperwork mitigation procedures are suggested, including (1) central oversight and clearance of data collection, within the agency seeking data; (2) redistribution of paperwork to specialized personnel; (3) reduction of excessive standards of accuracy or comprehensiveness; (4) filtering of "junk" memos, notices, and other paperwork; (5) better conceptualization of the usefulness of the data; and (6) substitution of more efficient means of carrying out paperwork's "ritual" functions (such as the wielding of power). (Author/RW)

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EDUCATIONAL PAPERWORK

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Abstract

Many educators feel burdened by what they regard as an excess of "paperwork." Some, too, feel demoralized by it. This paper suggests how some of these excesses might be curbed.

First I explore the various legitimate purposes that paperwork was presumably invented to serve. Secondly, I review the reasons why paperwork, even when directed to these purposes in general, might nevertheless be excessive and burdensome in particular applications. Finally, I describe an array of possible mitigation measures: central clearance and oversight of data collection efforts, redistribution of the paperwork burden to specialized personnel, reduction of excessive standards of accuracy and comprehensiveness, "filtering" of "junk" paperwork, and better conceptualization of the possible uses (and non-uses) of "data."

Like nearly everyone else in the society, educators have been obliged over the last fifteen or twenty years to absorb a steadily growing burden of paperwork. In the six-month period July-December 1981, for instance, California schools and school districts were obliged to submit to the State Department of Education 78 different annual reports on one or another matter, such as the Special Education Master Plan, the Annual Report of Pupil Transportation Expense, the Preschool Incentive Grant Application, the School Immunization Survey, the Bilingual Teacher Waiver, and the Survey of Basic Skills: Grade 12. Each month during this same period another five reports were due, including the Claim for Reimbursement: Child Care Food Program and the School-Age Parenting and Infant Development Program Report of Attendance, Income, and Expenditure. Twelve quarterly reports were due (counting each of six twice), like the Declaration of In-Kind Contributions for Campus Children's Centers. And up to 69 reports, due "as required," could also have been called for, e.g., the Application for One-Time Only Funds to Children with Special Needs and the Family Child Care Home Approval Survey.[1]

At the federal level, the U.S. Department of Education estimated that some 1.2 million hours per year would be spent in fiscal year 1981 by state and local agencies filling out federal reports and forms. This includes items like the lengthy annual reports on Title I expenditures(for the educationally disadvantaged), periodic surveys like that on participation of nonpublic schools in federal education programs, and special evaluation studies like one on Title VII in-service teacher training programs and another on the role of federal funding in facilitating desegregation.

Many of the reports required by the state, and alluded to above, really originate with the federal government, just as many reports required of local

schools by the school districts originate in state requirements. Eventually, however, the burden of much of the information collection activity is passed along to school principals (and vice-principals) and ultimately to teachers. When the burden of filling out forms and the like falls to the lowest level of the educational hierarchy, the teachers, pure quantitative measures of the burden, like the number of hours needed to do the work, will not suffice. Professional demoralization and alienation must also be taken into account. Consider the testimony, for example, of one elementary school teacher:

> "In a typical day an elementary teacher deals with sign-in sheets, lunch counts, hall passes, absence slips, rollbooks, attendance cards, class count forms, parent communications, textbook and materials requests, lesson plans, student evaluations, documentation, (and) paperwork relating directly to teaching students. Additionally, different levels of the bureaucracy frequently request distribution and collection of questionnaires, ethnic surveys, free lunch applications, permission slips, walking trip permits, emergency cards, class schedules, federal forms for Impact Aid, home language surveys, audio-visual surveys, needs assessments, nine-week objectives, yearly objectives, report cards, requests for special services, testing materials, program descriptions, time cards, field trip requests, and several profile cards for each student. (All this at a time when teachers are also being told there is not enough paper for lessons and art projects.)
>
> Much of the paperwork is related to monitoring, evaluating, regulating and verifying the teacher's behavior. It results from mandates at the federal, state, district, and school levels . . . Those teachers who do attempt to criticize the paper overload find that they cannot get to the source of it. It becomes simpler to do it pro forma

than try to comprehend it. Teachers learn that their documentations are usually passed up the line without being read. Even when they are read, administrators have no time to verify the accuracy of the statements. Morale is lowered and paperwork becomes a meaningless exercise."[2]

The Uses of Paperwork

Paperwork has a bad name among educators as it does among many other people, and unquestionably this bad name is, in part, deserved. Yet it is important to see the paperwork problem in perspective. Much paperwork does serve a purpose. Any notions as to how to reduce the paperwork problem--and this paper will aim to furnish some--must take account of these purposes.[3]

In this section, I offer a qualitative listing of instrumental functions of paperwork. In doing so, I heed only the functions of paperwork that are pertinent to certain collective, or public, purposes, and ignore (for the time being) the uses of paperwork for private or narrowly self-interested ends.

1. Substitute for Direct On-Site Inspection. It is necessary to state the obvious: much paperwork aims to force people to reveal truths they might otherwise prefer to keep hidden, and in doing so it forces people to shape their conduct so as to make the revelations acceptable to whichever parties might audit the paper and, thus, indirectly monitor the conduct itself. This sort of paperwork is directed, in a word, at compliance. It secures compliance, ultimately, by pressure and threat, and detects and punishes the deviant cases of non-compliance that occur when pressure and threat fail.

It is equally obvious that self-revelation via forms and reports is not the only way to monitor the regulated population. Direct on-site inspection is another method frequently used in many policy areas, ranging from occupational safety to restaurant sanitation. Yet there are many advantages to

self-revelation as opposed to revelation by outsiders, especially from the enforcement agency's point of view. For a given expenditure of agency funds, paperwork can greatly extend and deepen the reach of regulatory surveillance compared with what could be done with inspectors. Inspectors must be paid by the agency, but paperwork imposes a burden of self-inspection and self-certification on the regulated parties themselves. Secondly, the time and transportation costs of site visits are much larger than the costs of sending reports and other documents through the mails. True, the agency must incur costs for printing, collecting, storing, and auditing the paper flow that it has mandated, and these can be substantial. Yet in many cases the cost advantage still lies decisively with enforcement through paperwork. To take a homey example, it is a lot less costly to have parents and teachers produce and transmit the information about the eligibility status of potential student recipients of Title I aid than to have auditors dispatched by the federal government circuit riding in every school and classroom to do the same job. The federal auditors in this field (like income tax auditors) can best be deployed monitoring the suspect cases and generally acting as a deterrent to dishonest eligibility reporting.

It may also be noted that paperwork and site visits can usefully be combined. Nursing homes in California, for example, are required to maintain extensive records on patient care and financial practices that are regularly audited by inspectors on their occasional visits to the facilities. And California state-sponsored school-site evaluation teams typically prepare themselves for their visits by reviewing the paperwork files of the schools they are to visit.

2. Pseudo-Contracts. Compliance with regulations is frequently a process rather than a one-time affair: next year's plans almost always include reports on last year's activities. In many social programs, plans and reports are a staple feature. They can figure in the ongoing compliance process primarily if they become elements in a continuing negotiating process between applicant and funding source. The applicant points to past accomplishments, while the funding source points to past discrepancies between promise and performance. The applicant points to promises to do better next time; the funding source asks for better assurance that the promises will be kept this next time, and so forth. Of course, inspectors can negotiate in the same way; but plans and reports have the added advantage of creating a documentary record of negotiations, mimicking the legal and moral symbols of private-party contracting, and intensifying personal responsibility by fixing individual signatures to paper promises.

Probably this process does not occur as much in education as it does in certain other program areas. To the extent that it does occur, the relevant negotiators may be local "advocates" for compliance rather than donor-agency officials and auditors. For instance, Paul Hill describes a "sex equity action plan" adopted by a school board subsequent to a self-evaluation report that had revealed certain discriminatory practices. Hill reports that the plan "then became a valuable accountability device in the hands of the districts' 'advocate' compliance coordinator and the public advisory council whose actions he orchestrated."[4]

Another example of paperwork as "contracting" is even more explicit: the individualized education program (IEP) required under California law for students who are handicapped in some way (physically, emotionally, or intellectually) and receiving services under the Master Plan for Special Education and the federal Education for All Handicapped Children Act. The IEP documents, at some length, the student's present performance levels, the goals and objectives for

the student during the next instructional period, and the resources needed to achieve the goals and objectives. An IEP can easily run five or six single-spaced pages. It must be reviewed by the student's parent and a number of consulting specialists and school officials. In spirit as well as in form it frequently has the character of a contract, and in fact does sometimes become a key document in formal administrative hearings or even litigation following parental complaints.

3. Due Process and Participation. Paperwork requirements may have an especially useful attention-focusing role when the joint action of many semi-autonomous parties is at stake. We mentioned above "plans" that made promises about future action. If the plan is to be produced and executed by only one party, the promises made in the plan perhaps have some chance of being carried out. The more parties involved in the plan, however, the less likely it is to be meaningful--at least under most conditions. Each separate interest describes what it is doing and what it proposes to do in the future, but there is usually no social or political mechanism for reconciling divergent submissions or for imposing some priority order on the several projects. As one person familiar with EPA-mandated local "transportation control plans" (aimed at reducing auto usage and therefore smog) said, "The main instrument of planning here is a staple gun."

Nevertheless, there may sometimes be value in having divergent or even opposed interests, which might otherwise not have a forum, participate in the "planning" process. For example, privately sponsored social service and mental health agencies in California have often used the forum provided by the annual process of state-mandated county plan preparation to seek larger allocations at the expense of public agency service providers who normally dominate the expenditure of state and county mental health funds. The Health Systems Agencies (HSAs) set up by the 1974 National Health Planning and Resources Development

Act were to incorporate a "consumer" majority on each board. The framers of the act assumed that physician interests and those of other professional or institutional providers dominated health planning, and they wanted to give more of a say to consumers who were "broadly representative of the social, economic, linguistic, and racial populations of the area." The structures created to accomplish this purpose were in fact effective in this limited respect, but the overall effect on policy outcomes was insignificant since the HSAs had only advisory power and could be overridden by state bodies.[5]

In education, probably the outstanding example of paperwork intended to serve this function is the process of developing an IEP for a handicapped student. The process is now relatively formalized, with each of its steps marked by not insubstantial piles of paperwork. Because the designers of the law were attempting to reform a pattern of abuse and neglect, they designed a set of procedures that were intended to focus attention on the genuine educational needs of every handicapped student and to protect students who were not genuinely handicapped from being stigmatized as such and deprived of opportunities available to the non-handicapped. Extensive student assessment procedures are required, including consultation with a number of professionals and specialists. Parents must be brought into the discussion; and if they are unwilling or unavailable, then the professionals in charge of the student's disposition must document their own failed attempts to induce parental participation.

School-site parent advisory committees are invoked as a way of involving parents both as potential supporters and as potential critics of certain programs. More broadly, these committees are forums for the airing of views and the resolution of controversy; and in some important cases, they are also genuine powerholders, i.e., when they must approve school program plans for

the expenditure of special state- or federally-funded assistance. In California, the annual school-site application for the full range of state and federal assistance must be reviewed not only by the principal, but also by at least four parents and one teacher as well. The parent who chairs the "school site council" must review the plan to expend funds under the state's "school improvement program" and three parents must review the plan to spend Title I funds, including a parent who chairs the bilingual education subcommittee and a parent who chairs the preschool advisory subcommittee. Of course, not all of these committees function very actively, and in many schools the signatures are obtained merely pro forma. However, there are also many schools in which parental participation is broad and intense.

4. Consciousness-raising. As we have said, much educational paperwork aims to induce compliance. Yet, in an important sense, "compliance" and its close relative, "deterrence," are much too narrow definitions of the objectives of the paperwork regime. The idea behind the reporting and documentation requirements typically is not merely to banish misbehavior, but to encourage higher levels of performance, greater commitments to acting "responsibly" and even "creatively." We do not want a special education teacher merely to avoid doing harm to a student, but to accomplish something positive as well, a "something" which is hard to specify in law and regulation or to enforce through any conceivable set of paperwork requirements. A principal, or district-level administrator, should not merely throw a Spanish-speaking teacher and 25 Spanish-speaking students together in a classroom for a few hours and consider his or her duty discharged. Legally, it may be, but the periodic reporting requirements ideally should serve as reminders that the state and federal governments <u>care</u> about the problem of limited-English speaking (or non-English speaking) students and that the principal should care as well.

In this respect, as in many others, the regulation of education is similar to most health and safety regulation. The problems in these areas are continuous and often pop up with novel features. Hence, only a diffuse attitude of concern and responsibility is suited to dealing with them. We do not want a manufacturer merely to install proper machine guards and issue a safety manual to foremen. We want "safety consciousness" on the part of all personnel, from the lowest wage earner to the highest manager.

Probably paperwork is less suited to consciousness-raising than is direct inspection, which can multiply face-to-face contacts that potentially (if not commonly, in practice) are better able to inspire and educate than are contacts mediated by paper flows. Nevertheless, the steady, day-to-day obligations of some sorts of paperwork might have certain advantages. Just as inspectors can serve a reminding function, so too can the continuing obligation to fill out certain forms and documents.

Indeed, so too can the continuing obligation to read certain forms, documents, and other written communications. Perhaps the most interesting and surprising discovery I made in the course of my fieldwork was that educators count as part of "the paperwork problem" the reading of memoranda, circulars, notices, and so forth. In fact, the three principals and vice-principals I interviewed all responded to the open-ended question, "What sort of paperwork do you find the most burdensome?" with immediate and fulsome accounts of what they had to read. They had to be prodded into mentioning the kinds of paperwork that required them to write reports or fill out surveys or complete documents. Most of the writing requirements that came their way, they said, were passed along to either teachers or clerical help. Not that they felt

free of the paperwork burden: quite the contrary. They felt "deluged" and "swamped," but by the obligation to read rather than to write.

Yet, whichever aspect of the paperwork phenomenon one considers paramount, both might play the same role in "consciousness-raising." The psychological and social processes at work are subtle, and I do not pretend to understand them. But to the extent that I have been able to catch a glimpse of them, I should say that paperwork of both the reading and the writing varieties has some of the qualities of ritual for educators.[6] It is perhaps not so much the content of the documents read or written upon as it is the sheer volume of the symbols devoted to one or another topic that makes an impression. The amount of attention given to matters of ethnic identification, the poverty (and non-poverty) status of children, and financial accountability in the flow of documents throughout any large urban school district is a constant reminder that these are matters one is supposed to care about. As David Tyack pointed out in a seminar discussion, in the nineteenth century teachers were supposed to care a lot about attendance rates and truancy--and were obliged to compute periodic attendance rates to three decimal places! A second ritual aspect of paperwork is that it creates a separate fictional world, reflective of this real one but only somewhat so, that is in important respects more comforting and more manageable. Violent acts by students turn into "incident reports," and a band of tuned-out, sullen, and barely literate sixth graders becomes a statistical cohort of "educationally disadvantaged" students. To the extent educators become involved in this parallel world, however, and take it seriously, involvement probably enhances feelings of solidarity and mutual support--partly because those who participate share a common language not fully appreciated by outsiders and partly because they are all implicated in the continuing distortion of "reality" in the interests of protecting the

education community as a whole, and each of themselves individually from a harsh reality. Finally, it should be noted that ritual is not merely an expression of group cohesiveness, but an instrument of power wielded by the majority or other dominant group to keep deviants in line, or at least to communicate to the deviants what the correct line is. Those educators who really don't care at all about poverty students or ethnic sensibilities or financial integrity are constantly reminded that others do and that they should care. The fact that these reminders come in code, signalled by the volume of paperwork on certain topics rather than by a more manifest and explicit vehicle, may in fact heighten their persuasive power over the long run.

The Real World of Educational Paperwork

Despite these many actual and potential uses of educational paperwork, much paperwork in the real world is bound to be useless or worse. In part this occurs for the same reason that all regulatory paperwork--and indeed, regulation--is bound to be excessive: it imposes standardized prescriptions on highly varied problems, and this necessarily produces a large number of cases in which regulatory structures are too burdensome or are inappropriate to the true situation. Surely there are some cases in which the elaborate procedures surrounding the development of the IEP produce better results for the individual child, but in many cases these procedures are simply a waste of time and energy. It may be that the child's problems and needs are obvious, and the indicated course of action a foregone conclusion. Or it may be that the school district has such limited resources that the developemnt of an ideal IEP is simply a charade. Although certainly there are some districts, schools, and teachers that systematically dump troublesome students into special education classes that deliver little educational benefit to these or other students, there are many other districts, schools, and teachers that genuinely try to do the best they can for

students and for whom the procedures and associated paperwork are a terrible and demoralizing encumbrance.

Another similarity between educational paperwork and regulatory paperwork more generally is its sensitivity to demands and criticisms originating in the political environment, particularly the legislature. The essence of a "compliance" regime, after all, is that some (perhaps many) people are assumed to be misbehaving unless they are constantly monitored and discouraged from doing so; and the political climate surrounding such a policy is bound to be one of suspicion, first of those who are being monitored and secondly of those who are supposed to be doing the monitoring. Laxity, cooperation, and perhaps even corruption are the besetting enemies of all compliance programs. And so, of course, is the constant suspicion that these enemies may, secretly, be in the ascendant. Frequently, more reporting and documentation requirements are involved to banish such suspicion.

The dynamic is best illustrated in some areas outside that of education, where suspicions intermittently erupt in the wake of scandals or sudden catastrophes which bring in their wake more paperwork. Consider, for example, what happened when the Washington Post revealed in September 1979 that the U.S. Department of Agriculture (USDA) was shipping daily hundreds of dollars worth of usable office furniture for burial in the District of Columbia's Lorton dump. Notwithstanding the U.S. General Accounting Office (GAO) promises to get a better grip on things, one month later a GAO auditor testified that he saw 2,000 pieces of furniture stored in a USDA basement and $38,000 worth of new, largely unopened cartons of furniture in the agency's attic while the department continued to buy new furniture. The result was, first, a governmentwide freeze on new furniture aquisitions, then a GSA order (issued after prodding by Congress and OMB) to every federal agency to draw up and submit an annual furniture

requirements and expenditures budget. Exemptions from the freeze were virtually impossible to get, leading to the usual assortment of anomalies and inefficiencies such as expensive electric typewriters remaining unused for want of typewriter tables. The annual furniture requirements and expenditures budget quickly became a bureaucratic laughingstock because it was irrelevant to the day-to-day practical wisdom that--to the skeptics, at any rate--ought to guide furniture acquisitions. It lasted only one year.

The paperwork governing the use of human subjects in university-sponsored scientific research is another case of overreaction leading to overgeneralization. Researchers must document their intended procedures and have them cleared by a central campus committee charged with protecting human subjects. Researchers must also provide the committee with detailed assurances of how they will inform subjects of their risks and their rights to withdraw from the research. In principle, this sort of regulation may be beneficial. In practice, however, it spread from biomedical research, where it was clearly appropriate, to areas where its value was dubious--e.g., administering balance beam walking tests to elementary school children.

In the case of elementary and secondary education, we do not see the eruption of acute crises that produce demands for more accountability. Rather, the accountability crisis is chronic. There is no need here to dwell on the decling status of public school teachers and administrators, the breakdown of public confidence in large portions of the school system, the mistrust by minority groups of the practices and intentions of school administrators and teachers from a more mainstream background, and the difficulty inherent in the educational enterprise of demonstrating in any technically rigorous way just how effective the schools may or may not be. These conditions add up to a powerful magnet for scrutiny and criticism and, of course, for a flood of reports and data. Persons I interviewed in the California State Department

of Education insisted that most of their own demands for data and reports grew out of prior demands levied in the statutes and appropriations bills or out of anticipated demands that might arise in oversight hearings. These legislative demands covered a broad spectrum of issues, from simple statistical counts as to how much money is spent on how many Title I students in which school districts to whether money spent on teacher in-service training is producing positive results. And, of course, the State Department of Education, in turn, must be suspicious of the truthfulness of reports from the district level. Especially in the current era with the bulk of school budgets supplied by the state treasury, the districts must respond to the state's increasing concern that all its monies will be spent responsibly and honestly. Since so much state money is tied, on a per student basis, to reported "average daily attendance" (ADA), a lot more resources than previously are expended on collecting these data (appropriately broken down by assistance eligibility category) and to auditing the data that are collected and reported. It is only in recent years, for example, that the state has demanded audits of student absentee notes, so that invalid excuses or nonexistent notes could be invoked as reasons to demand local reimbursement of state monies tied to the ADA figure.

The technical problems of designing "good" paperwork are often formidable and can inspire administrators to try to compensate by imposing more and more documentation requirements. It is worth remembering that a central function of documentation is to force regulated parties to reveal truths that might otherwise have remained hidden. However, the correspondence between what documentation reveals and the underlying reality is likely to be rather weak. One reason is that devious people will attempt to hide infractions if they think they can get away with doing so. While control agencies naturally try to design paperwork systems that will permit auditors to detect evasion, this task is not

necessarily simple. The Environmental Protection Agency, for example for some time toyed with the idea of requiring extensive annual reports from all hazardous waste generators and hazardous waste disposal sites as to what materials had been sent and received, respectively. By feeding these data into a computer and instructing the computer to match the alleged inflows and outflows, staff thought that they would be able to discern discrepancies and track down violators. On further analysis, however, it turned out that such a task would have been extremely costly, even with computer assistance and it would have been well nigh impossible if reporting firms had taken even moderate pains to disguise the truth.

In the case of education, the problem of deception takes on a different and more subtle character. In this area, the typical problem is to monitor the use of grant-in-aid funds, to ensure that they are being used for the purposes for which they were allocated by the funding source (usually the federal or the state government). Yet the technical difficulties of doing this are often so great as to be insurmountable. As Stephen Barro has pointed out, trying to enforce donor priorities by tracking funds from the source to their final use is virtually hopeless unless the prescribed use and the tracks that lead to it are highly visible against the background of all the other tracks and destinations in the great thicket of state and local education programs.[7] The main problems here are that donor funds can often be used to substitute for funds that would otherwise have come from the recipient's own budget, and that it is necessarily obscure just when and to what degree this substitution might be taking place. Strict recordkeeping and dedicated auditing can allow the thicket to be penetrated to some extent, but not completely. Even truthfulness and green-eyeshade commitment to accuracy are not enough to make documentation correspond adequately to the realities that underlie it. Frequently there are immense technical difficulites in representing in words and numbers a reality that often is subtle, elusive, and obscure even to the

most self-scrutinizing and honorable individual. Consider, for instance the inherent limits of words and numbers as descriptors. While it may be possible to document that $500 in grant funds were indeed expended, and legitimately so, for three teachers to attend a conference on science education, say, it is not possible to document what they learned there or indeed whether they paid any attention to the conference proceedings even while seated in their midst. Or consider student "ethnic identification": operationalizing this concept for documentation purposes leads quickly to such perplexing issues as "genealogical purity," cultural assimilation or distinctiveness, and the appropriateness of various methods of eliciting the information (like self-reporting or visual inspection). Conceptual and moral questions aside, the purely technical aspects of the problem are quite problematic in themselves.

While this brief review of "the real world of regulatory paperwork" has not surveyed all the reasons for its characteristic excessiveness, it has highlighted the more fundamental and probably less remediable ones. In the following section we shall examine some others, in the context of exploring certain measures that might be taken to mitigate these excesses.

What Is To Be Done?

It is useful to distinguish between two sorts of "excessive" paperwork, the sort that achieves some desired objective but at a cost (in time, or money, or aggravation) that is considered too high, and the sort that, whatever its costs, is simply ineffective and therefore wasteful. The distinction is useful mainly because it reminds us that remedies to shrink or abolish excess sometimes need to be joined to policies that furnish some functional equivalent for whatever is lost in the process. In this connection, we may mention, without elaboration, the proposal to substitute a standards-of-service approach for a tracking-of-

funds approach in federal grants management that Barro moots very favorably. Simply put, the idea is that grants could be conditioned on the recipient unit (state or local education agency) meeting certain standards of effort or performance, e.g., spending no less than $400 per child on compensatory education or spending on handicapped students no less than 1.5 times as much as is spent on regular students. All the paperwork that went into the (largely ineffective) tracking of federal funds could then be eliminated. To be sure, other sorts of paperwork would rise up to take its place--although they would probably be less onerous. The important point here, though, is that federal controls over local allocation decisions would not necessarily be weakened and might even be strengthened relative to those that exist now.

Most of the "excessiveness" targets we could plausibly aim at, though, are of the type where the paperwork is nearly pure waste. They originate not so much in the substantive requirements of policy and programming but in the organizational and political pathologies that surround policies and programs. While it is true that excessive paperwork of this type might serve some interest, and the attack on such interests might be repelled and certainly would be resented, it may not be necessary or desirable to invent a substitute to satisfy the deprived and disappointed interests. With these preliminary observations, then, let us turn to some possible remedies for excessive educational paperwork.

1. Central clearance and oversight. One important reason that paperwork increases is that the people who impose it do not pay the full costs of doing so. To be sure, they may have to pay for the reproduction of forms, mailing, and the processing and storage of information when the forms are returned; but they do not have to expend time and energy filling out the

forms (or to read memos, in the case of paperwork that does not require a written response). Moreover, those who impose paperwork on others can usually be expected to hold an exaggerated idea of its benefits. If it is a request for data, let us say, normally the data will be thought to serve some purpose related to their agency's mission; and it would not be surprising if agency personnel had an inflated idea of the importance of this mission. Even more importantly, because it is very little recognized just how irrelevant most "data" are to making important policy or managerial decisions, requests for data frequently arise out of sheer ignorance, albeit an ignorance allied to good intentions.[8]

One approach to this problem of distorted incentives and systematically mistaken beliefs is to institutionalize an organizational unit that will act as a counterpoise. The inappropriate beliefs and motivations may remain, but they will be checked and balanced by a force tending in the other direction. An example from outside education is the Office of Management and Budget, which, under the Paperwork Reduction Act of 1980, reviews almost all federal agency reporting forms and requests for information. In the California State Department of Education an interesting and relatively successful unit of this type is the Data Acquisition and Review Committee, which came into being in 1977. It reviews almost every proposed new Department data collection effort. It vetoes some, trims others, encourages the consolidation of still others, and facilitates access to existing data sources by users who otherwise might have initiated the collection of data afresh. Its function is similar to that of the Federal Education Data Acquisition Council, which came into being a year later.

Such bodies are essentially regulatory, although in the nature of the case the people they regulate are often themselves regulators. Like all regulators the DARC and the FEDAC are not universally loved. Their review processes take time, their criticisms may wound egos, and their decisions and policies might even threaten jobs. Given the great volume of paperwork in education, a large number of people are employed doing it as their principal occupation; and to abolish the paperwork means to abolish their jobs and/or to diminish their status. Of course, it is easier to forestall proposed new data acquisition eiforts than to abolish old ones, for the old ones have a constituency. One of the first targets of the DARC from among existing reports was the copy of student drivers licenses that came to the State Department of Education. Tens or hundreds of thousands of these pieces of paper came to Sacramento annually and were subsequently thrown away. No one had any use for them. But when the DARC proposed to abolish the procedure, initially it ran into much resistance, especially from local driver education instructors and program administrators. The director of the DARC conjectured that, "It was just habit with them. They didn't want to change, and they didn't want to be told that what had been going on was useless, even if they knew it anyway." The district people were supported by their professional driver education counterparts in Sacramento, whose inertia has permitted the wasteful practice in the past and--we may suppose--who feared that too close a look at their practices more generally might lead to workload reductions and then to personnel reductions.

The apparent success of central clearance at the state and federal levels raises the possibility that a comparable institution could be made to work at the district level. Obviously, this would make sense only for large school districts that generated a lot of paperwork themselves. Since district officials like to blame the paperwork burden on the state and federal governments, it might prove embarrassing to admit implicitly that the district was indeed in a position partly to remedy the problem. However, the California State Department of Education, which likes to deflect blame as much as any bureaucracy, did manage to overcome this political obstacle and establish the DARC; and the comparable argument can be made regarding the FEDAC.

A useful tool to back up the staff of a central clearance office might be a "sunset" policy that automatically terminated the life of any data request procedure after a certain time unless the procedure were to be explicitly reauthorized.

2. Redistributing the paperwork burden. It is not only the total burden of paperwork that is of concern, but its incidence as well. The social loss imposed by paperwork is greater if the incidence is on educational personnel who are playing especially productive roles in the system, e.g., classroom teachers as opposed to front-office clerks. Although it is dangerous to generalize about which roles most deserve to be spared, we might speculate that: administrators should usually absorb the reporting requirements that might otherwise fall on teachers and parents; "project coordinators" who oversee state and federal special grant money that requires financial and program accounting should absorb the burden that might otherwise fall on general-purpose administrators like principals; district-level "research" and statistical specialists should lift the burden off school-site project

coordinators or other administrators; and clerks should be given the paperwork jobs that otherwise fall to administrators and professionals in general. Best of all, certain routine data processing and reporting tasks should be given to a computer.

Just how far this sort of specialization can be carried depends on budgetary resources and on the magnitude of certain diseconomies associated with specialization. Budgetary resources in most school systems have been unusually hard-pressed for the last several years and are likely to remain so. This means that it may not be possible to invest in productivity-increasing but expensive computers, or to retain central office personnel whose duties had revolved mainly around decreasing other people's paperwork burdens. It might sometimes work out that there is a conflict between the goal of overall paperwork reduction and the goal of sparing the most productive personnel. Consider, for instance, the new "CBEDS" (California Basic Educational Data System) instrument, a computer-readable survey that is administered on a single day in October every year to every teacher, principal, and superintendent. The intention is to create a data base that will permit the State Department of Education to prepare a variety of statistical reports, including all those required by federal agencies and a good many requested on an ad hoc basis by curious legislators or others. In theory, CBEDS would displace many separate reporting efforts that previously fell to individual school sites and school districts, since it would make available a vast reservoir of highly disaggregated data from which one could draw almost any combination of frequency distributions and cross-tabulations for almost any reporting purpose. This looks like beneficial workload redistribution in the sense that it consolidates reporting on a single day and turns the processing job over to clerks and computers. But the price is an added burden on professionals' (teachers')

time that had not previously existed. Of course, CBEDS might in the long run also manage to remove some burdens that had fallen on teachers; and this reduction, together with the reduction of the burden on specialized administrators, might in the end offset any new burdens. For the time being, however, teachers dislike CBEDS, and district-level administrators are divided on whether it is making their lives easier or harder.

3. Reducing excessive standards of accuracy and comprehensiveness. Whether intended primarily for the State Department of Education or for professional peers sometimes brought in to review it, the annual school site plan is typically a bulky and unreadable document. It may obfuscate as much as it reveals, though not necessarily intentionally. One elementary school principal decided to compress his entire statement into a few pages, though, and the result was passed around among his fellow principals as though it were a piece of the true cross.

Another principal told of how, instead of responding to a statistical request with full deference to the level of accuracy required, she simply estimated the numbers. "The staff person who knew the exact numbers was away on vacation," she said, "and I knew my estimates would be reliable enough for the purposes the district has in mind."

A district official in charge of overseeing the implementation of PL 94-142 told of how he made a special effort to reduce the level of detail required in the IEP write-up prepared for each student considered for special education. "I just put a few headings on the form, like 'Present Levels of Performance' and 'Prioritized Annual Goals' that conform to what state and federal regulations indicate. But I don't go beyond this. I leave it to the professionals to put in whatever level of detail they think is needed in the particular case."

4. Filtering junk memos and notices and reports. One principal I interviewed had an excellent reputation among his teaching staff for protecting them from paperwork. "Look," he said, "here's a notice about a conference on a new approach to student discipline that the district wants me to send to the teachers in case they're interested. I'm throwing it away. The district just ran a large-scale in-service training program four months ago in which we all got trained in a completely different approach. This just undermines what we did. So why even bother the teachers with it?" Of course, he said, one has to be careful and not overdo it, but "the teachers know that I filter these things and are grateful that I do it."

If the junk memos and requests do get through to the teachers, or to other presumptive data providers, these persons can do their own filtering. That is, they can simply ignore the demands made on their time and energy by discarding the offending items without a response, or in some cases without even a glance. One can view this sort of conduct as insubordination or intelligent time management, depending on one's sense of hierarchy and on one's sense of the substantive importance of the item at issue.

Outright refusal to fill out a form or answer a survey is probably quite uncommon, to be sure, especially since educators have learned to be docile in the face of such demands. Delay, however, is probably more acceptable and hence more widely used. One principal told of his Deputy Superintendent sending out a memo asking for some information that the principal thought was pointless; the principal decided not to respond until he was badgered once or twice by his superior. He added, "There's some chance he'll come to see it's pointless, too, or anyway forget about it, and so I'll have avoided another piece of paperwork."

5. Demythologizing "data." Of what use are "data?" Data are symbols that (purportedly) describe conditions in the real world. They are useful to the degree that they help people improve their understanding of how the world works and/or indicate courses of action that are likely to be superior, in some sense, to the courses of action that would probably have been selected otherwise. Useful data, therefore, become a form of "evidence" supporting an interpretation of things or possibly, also, an argument about what course of action to take. Such data are known as "information."

Converting mere data into genuine information normally requires the work of active intelligence. The data must be brought together with some pre-existing theory and the theory modified (or reaffirmed) in the light of the data. This, at any rate, is what happens, in a general way, at the individual psychological level. Since organizations also collect data with the aim of converting at least some of it into information, it is also necessary to understand how this process works. Unfortunately, the social scientific understanding of such matters is still quite rudimentary. It is safe to say, though, that most large organizations--and especially public organizations--probably collect too much data. That is, given that collecting data is costly, to someone if not always to members of the organizational unit collecting the data, the marginal costs of much data probably exceed their marginal value considered as potential "information." To put it more graphically, there are lots of unread reports taking up shelf space and gathering dust, and reams of computer output that few people can interpret at all much less use to make a decision about anything.

Surely there are many reasons for this, but one that needs immediate emphasis is the fact that it is usually genuinely difficult to know whether

any particular data are in fact informative, even when one has them in hand. And before one has them, it is literally impossible to know whether they might be useful. As the saying goes, "We don't know what we don't know." Hence it is always possible to convince oneself that if we knew just a few more facts ("data") we might suddenly grow a great deal wiser (more "informed."). Furthermore, it is impossible to prove to a person thus convinced that such a belief is mistaken and that the costs of further data collection are really not worthwhile. Add to this the fact that those who pay the costs are not usually those who conceive of the likely benefits, and multiply by the tendency to underestimate the real costs that are involved in "merely" filling out a statistical survey or documenting the reasons for a pupil assignment decision, say, and the dynamic towards more and more paperwork is obvious.

As one former district superintendent told me, "people get bright ideas and just tack things on." That is, they add questions to existing survey instruments. The same applies to more ad hoc requests for data: "somebody decides it would be nice to know something, and before you know it, letters are being sent to a bunch of principals asking for information."

Computers, moreover, with their apparent ability to search through massive data files and to correlate everything with everything else, support the illusion that all data are potentially informative. It is little noticed that the bureaucratic and human context in which computers are utilized often constrains their actual use within quite narrow limits (Malvey 1981). Consider, for instance, the case of the Environmental Protection Agency staff proposal, mentioned above, to require extensive annual reports from all hazardous waste generators and hazardous waste disposal sites as to what materials had been sent and received, respectively.

The designers of the proposed annual report requirement scarcely consulted with the computer operators in EPA to see if the data they would have obtained could have been processed usefully. Not until many months had been invested in preparing the reporting forms did they go through the exercise of imagining what they would have done with these data if they could have been processed. Among the questions they needed to ask:

- If we find an apparent discrepancy between wastes generated and wastes properly disposed of, how do we know this is not simply a case of incomplete or tardy reporting?
- How do we know we haven't lost the forms or punched the data into the wrong places?
- If we proceed with an investigation as though there were a potential violation, what backlash do we create if it turns out that there is no violation but only a bureaucratic snafu?
- How can we tell if someone is lying? What sorts of additional computer runs and other inquiries will be necessary merely to establish probable cause for further investigation? Will we have the resources to do these tasks?
- If the regulated community discovers that it is difficult for us to process and utilize these data, do we risk our credibility as enforcers of more important requirements?

Although it took the EPA staff many months to get around to posing such questions, ultimately they did so; and as a result, they scrapped the annual report requirement.

In introductory courses to graduate level social statistics, students first planning a survey are often urged to make up "dummy tables" filled with imaginary data so as to put a check on the collection of data that will prove to be unintelligible, unreliable, unanalyzable, or unenlightening. It is a very instructive exercise, expressing a profound bit of wisdom. But even when students accept its wisdom, they find it hard to put the prescription into practice. It would be surprising if educational bureaucrats--for whom data collection often has the same ritual meanings as it does for social science students--were better able or more willing to go through the same sort of drill. The U.S. Office of Management and Budget, and the U.S. General Accounting Office like to berate agencies for having failed to do pilot studies with data collection instruments before imposing new requirements. But a cheaper and even more effective procedure would be for agencies to simulate their decision and policy processes; that is, to do a bit of role-playing to see how they would, or would not, be affected by the data that might--or might not--come pouring in on any particular tide of paperwork.[9]

6. Substituting more efficient rituals. Although we have been assuming, to this point, that data-requesters want the data to be useful in some sense, that is, to be "information," data requests originate from many other motives as well. In some cases there is a desire to appear "rational," modern, and up-to-date. In other cases, there is simply a desire to wield power, to show who's boss, by successfully imposing some sort of paperwork burden on others. Perhaps a softer version of this attitude is what prevails in the education field: the desire to communicate to another party that that party is accountable to the person or agency generating the data, e.g., as regards Title I project reports or the results of standardized tests administered to certain classes of students.

But perhaps our softening of "power" into "accountability" does not go quite far enough, since the ideas of "accountability" itself, in the context of educational programming, is rather pale. Although educators talk a lot about the need for accountability, and the public's demands on them to be more accountable, in fact it is hard to hold them accountable for much. Even if their performance is poor, a combination of bureaucratic monopoly power, union rules, civil service regulations, and the "lock-in-effect" of grant-in-aid programs substantially insulates most of the individual and organizational participants in the educational system from the sort of accountability that is backed by sanctions. [10] Adverse publicity and moral suasion are the main tools invoked on behalf of "accountability," and these are not always very powerful (although sometimes they surely are). Perhaps we should speak instead of responsiveness. We said above that paperwork served certain ritual functions, but one that we have not mentioned so far is to act as a vehicle for democratic participation. Practically everyone in the system except the classroom teachers is in a position to ask someone else to undertake some bit of paperwork, especially

if by paperwork we include the reading of memoranda and other such items as well as writing. Again, except for teachers, almost everyone has a little bit of power to keep someone else responding to himself or herself in at least a small way. Most often the responsiveness ritual involves superiors obtaining expressions of deference (paperwork) from subordinates, but it can also involve peers relative to one another, which underlines the other side, the democratic side, of paperwork rituals.

To the extent that these speculations have any merit, it may be the case that reducing merely ritualistic paperwork cannot occur unless substitute rituals--presumably less wasteful ones--are instituted. Exactly what these might be it is hard to say. Much depends on the particular relationship within which the responsiveness element is to be maintained and preserved. In some cases face-to-face contact might substitute for paper communication with greater benefit and lower cost to all parties concerned. (One elementary school principal told me she eliminated vast quantities of paperwork by keeping an open door and encouraging teachers and parents to use it.) In other cases, like the relationship between administrators and school board members, say, reciprocal "stroking" could be worked out across a whole range of different issues over which they interact routinely.

Conclusion

The starting point of this essay was the observation that educators felt burdened by a lot of paperwork, that it had been increasing in recent years, that much of it was "excessive" in some sense, and that many educators were demoralized by the phenomenon. From this starting point we explored the legitimate purposes that paperwork was presumably invented to served in the first place. We then reviewed the reasons why paperwork, even when directed to these purposes in general, might nevertheless be "excessive" and burdensome in particular applications. Finally we suggested a number of ways in which these excesses might be curbed.

Surely this essay has raised more questions than it has answered. By way of conclusion, therefore, I shall suggest some specific directions for future research. The most important of these concerns a more precise estimate of the magnitude of the paperwork burden in education, particulary its qualitative rather than its quantitative aspect. What exactly is involved in the "demoralization" we referred to so loosely? Is it that paperwork is "sterile" and therefore represents a direct assault on the professional person's self-image as dedicated and productive? Is it that by effectively reducing discretion paperwork--or at least that portion aimed at "compliance"--leads to policy choices that the professional regards as inappropriate or even perverse? Or is it that it is demoralizing only when those who bear the burden do not believe in the rationale for the paperwork in the first place, or do not believe the originators of the demands for paperwork really understand what they are doing? In any event, whatever the subtle ways in which demoralization occurs, and whatever forms it takes, how extensive is it anyway? Only careful and extensive empirical work can throw light on these questions.

Assuming that paperwork does lead to some demoralization among educators on a scale great enough to be considered "a problem," we need a perspective on the larger problem of which this may be a part. First, might it not be the case that all "minor professionals" are vulnerable to the same demoralization as educators? The minor professions, like education, social work, law enforcement, correctional guidance, and nursing, cannot function without some degree of discretion and freedom from strict supervision. Yet they do not have the prestige, nor perhaps the competence or trustworthiness, to deflect criticism for the occasional abuse of discretion that lawyers or doctors can invoke on behalf of their respective professions. Have any of these other professions discovered remedies for the problem that could be embraced in education?

Secondly, to what extent is the problem shared by all public sector employees, whether educators or minor professionals or anything else? Demands for "accountability" have been increased on all public sector employees in recent years, with an accompanying increase in legislative oversight, media attention, and general citizen interest. Demands for evaluation and, hence, paperwork have grown apace. Furthermore, the vulnerability of these employees to criticism has almost certainly increased defensive "cover your ass" behavior in the public service; and this development, too, has increased the reliance on documentation and thus "paperwork."

Finally, is "paperwork" not simply a corollary of all forms of bureaucratic concentration of power and responsibility, whether in the public or the private sector and whether or not the process touches professionals or non-professionals? Probably if one interviewed employees in some subdivision of General Motors one would hear that they too were overburdened by paperwork, that much of

it was wasteful and foolish, and so on. Do educators sustain more of a paperwork burden than anyone else in a large organization (or constellation of organizations)? Perhaps they do, but how much bigger is the burden? In any case, are there paperwork reduction remedies available in the private sector that could be applied to the problems experienced by educators?

Excessive paperwork is not the most baneful problem of our time. Nor is it by any stretch the most important cause of demoralization in the education profession. Yet it might be one of the more remediable causes--up to some point--and further research in this area could prove to be not only intrinsically interesting but somewhat useful as well.

Footnotes

1. California State Department of Education, Data Acquisition Calendar, July-December 1981, Sacramento, 1981.
2. Della Peretti, "Implementation Problems in the Standardized Testing Program," seminar paper on file with the author, March 1980.
3. On regulatory paperwork more generally, see Eugene Bardach, "Self-Regulation and Regulatory Paperwork," in Eugene Bardach and Robert A. Kagan, eds., Social Regulation: Strategies for Reform, San Francisco: Institute for Contemporary Studies, 1982, ch. 14. See also Eugene Bardach and Robert A. Kagan, Going by the Book: The Problem of Regulatory Unreasonableness (a Twentieth Century Fund report), Philadelphia: Temple University Press, 1982, esp. ch. 3.
4. Paul T. Hill, "A Study of Local Education Agency Response to Civil Rights Guarantees," Santa Monica, Calif.: RAND Corp., January 1979, p. 16.
5. James A. Morone and Theodore R. Marmor, "Representing Consumer Interests: The Case of American Health Planning," Ethics 91 (April 1981), pp. 431-450.
6. Martha S. Feldman and James G. March, "Information in Organizations as Signal and Symbol," Administrative Science Quarterly, June 1981.
7. Stephen M. Barro, "Federal Education Goals and Policy Instruments: An Assessment of the 'Strings' Attached to Categorical Grants in Education," in Michael Timpane, ed., The Federal Interest in Financing Schooling, Ballinger, Cambridge, Mass., 1979.
8. Aaron Wildavsky, The Politics of Mistrust, 1981; Mari Malvey, Simple Systems, Complex Environments, 1981; David Dery, Computers in Welfare, 1981.

9. Unfortunately, this mental exercise is complicated by what might be thought of as the paradox of deterrence. If regulatory documents received by an agency were immediately to be shredded or burned without a glance at their contents, this fact would not necessarily prove documentation was excessive. Indeed, it might prove the reverse. A prime function of regulatory paperwork, after all, is deterrence; the best testimony to the system's deterrent effectiveness might therefore be a compliance level so high that there would be no point in the agency's auditing the paper flow in search of violators. The IRS, for instance, is alleged to destroy routinely the majority of employer- and taxpayer-submitted documents because the storage and search costs involved in auditing them would be too high relative to their yield and because taxpayers' fear that they <u>might</u> be audited induces sufficient compliance anyway.

10. On the "lock-in effect," whereby donors and recipients end up in a mutual financial or political dependency, see Walter Williams, <u>The Implementation Perspective</u>, Berkeley: University of California Press, 1980.